

REQUEST FOR CONFIRMED COPY

1 ANDREW WALTERS

2 P.O. Box 208

3 INDIAN SPRINGS, NV

4 89018

5
6
7 UNITED STATES BANKRUPTCY COURT
8 NORTHERN DISTRICT OF CALIFORNIA
9 SAN FRANCISCO DIVISION

10
11 Bankruptcy Case # 19-30088(DM)
12 CHAPTER 11

13 CREDITOR

14 ANDREW WALTERS - Claim # 86837 "Response"

15 May 24, 2022 (Deadline)

16 REORGANIZED DEBTOR'S

17 PG&E CORPORATION

18 PACIFIC GAS AND ELECTRIC COMPANY

19 oppose the disallowance
of selected to proof's
of claim

20 To The Honorable Dennis Montali, U.S. Bankruptcy Judge

21
22 "Response"

23 FIRE VICTIM, ANDREW WALTERS FILES HIS RESPONSE
24 opposing all of the "Debtors" defenses. In addition
25 ACK THAT THE BANKRUPTCY COURT should not SUSTAIN
26 THE DMRIBUS OBJECTION. CLAIMANT MAILED HIS CLAIM
27 DNL 10-16-19, 5 days BEFORE THE BAR DATE ORDER
28

1 10-21-19 (Deadline). The Debtors were in possession
2 of Mr. Walters claim on 10-21-19. The claimant
3 by virtue of the U.S. Mail service delivered his
4 claim to be processed in a timely manner, the
5 barred statute of limitation counter by the debtors
6 also fail to link section 350 of CCCP to a procedural
7 action this claimant failed to make, the sole
8 responsibility this claimant has legally is to
9 submit the claim before 10-21-19 "bar date order".
10 Under federal law a claimant / plaintiff are
11 afforded additional time to commence a court
12 action after learning of injury (property damage)
13 to file complaint. In this case damages was
14 observed on 10-14-19. In view of property damages,
15 the debtors have no scientific studies of air quality
16 that would oppose claim of damages caused by
17 smoke, soot, debris. Clearly the burden of proof is
18 on the debtors to disprove this fact. The debtors
19 are responsible for this property damage and should
20 not be afforded to avoid liability.

21 The claimant has provided a legal basis for recovery
22 against the reorganized debtors. First, claimant
23 points out (in the claim) the cause of damages
24 derive from the "fires". The debtors have not provided
25 any evidence to refute this.

26 The Bankruptcy Court should not sustain the omnibus
27 objection. First, it would violate this claimant
28 U.S. Constitutional Right (4th Amend.) Due Process.

1 THE DEBTOR'S STATE THE CHAPTER 11 CASES ARE BEING
2 JOINTLY ADMINISTERED FOR PROCEDURAL PURPOSES
3 ONLY PURSUANT TO BANKRUPTCY RULE 1015(b). FACT,
4 THIS IS A PREJUDICE CLASSIFICATION OF MR. WALTERS
5 CLAIM. HIS CLAIM STANDS ALONE ALLEGING
6 "ENVIRONMENTAL DAMAGE", WHICH HAS BEEN UNCHALL-
7 ENGED BY THE DEBTOR'S ON THIS ISSUE.

8

9 RELIEF REQUESTED

10

11 THIS RESPONSE SEEK AN ORDER DENYING(ALL) OF THE
12 "DEBTOR'S OMNIBUS OBJECTIONS TO CLAIM. IT ALSO
13 SEEKS PROTECTIONS AFFORDED BY THE 4TH, 5TH AMEND.
14 U.S. CONST. IN ADDITION, RESPONCE SEEKS
15 APPOINTMENT OF COUNSEL FOR AMENDED RESPONSE.

16

17 DECLARATION

18

19 I, ANDREW WALTERS DECLARE I HAVE PERSONAL
20 KNOWLEDGE OF RELEVANT FACTS THAT SUPPORT
21 MY CLAIM & RESPONSE. ADDITIONATELY I HAVE
22 DIRECT KNOWLEDGE OF DAMAGES OCCURRED BY
23 THE FIRE(S).

24

25 DATED: MAY 16TH, 2022

26 Andrew Walters
27 Claimant

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ANDREW WALTERS 1057567

P.O. Box 206
MILTON SPRINGS NV 89118

REMOVED

MAY 12 2022

CLERK, U.S. DISTRICT COURT
NORTH DISTRICT OF CALIFORNIA

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA -
COURTROOM 17, 16TH FLOOR
450 GOLDEN GATE AVE
SAN FRANCISCO, CALIF. 94102

LAS VEGAS NV 890
9 MAY 2022 PM 5 1

